

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CAMBRIDGE PLACE INVESTMENT
MANAGEMENT, INC.,

Plaintiffs,

v.

MORGAN STANLEY & CO., INC.;
CITIGROUP GLOBAL MARKETS INC.;
CREDIT SUISSE SECURITIES (USA) LLC;
RBS SECURITIES, INC.; DEUTSCHE
BANK SECURITIES, INC.; MERRILL
LYNCH, PIERCE, FENNER & SMITH, INC.;
UBS SECURITIES LLC; GOLDMAN,
SACHS & CO.; J.P. MORGAN SECURITIES
INC.; COUNTRYWIDE SECURITIES
CORPORATION; FBR CAPITAL
MARKETS & CO., HSBC SECURITIES
(USA), INC.; BANC OF AMERICA
SECURITIES LLC; RESIDENTIAL
FUNDING SECURITIES, LLC; BARCLAYS
CAPITAL INC.; ACCREDITED
MORTGAGE LOAN REIT TRUST; ACE
SECURITIES CORPORATION; AEGIS
ASSET BACKED SECURITIES
CORPORATION; AMERICAN HOME
MORTGAGE ASSETS LLC.; AMERIQUEST
MORTGAGE SECURITIES INC.; ARGENT
SECURITIES INC.; ASSET BACKED
FUNDING CORPORATION; ASSET
BACKED SECURITIES CORPORATION;
BANC OF AMERICA MORTGAGE
SECURITIES, INC.; BCAP LLC; BEAR
STEARNS ASSET BACKED SECURITIES I
LLC; CITIGROUP MORTGAGE LOAN
TRUST INC.; CREDIT SUISSE FIRST
BOSTON MORTGAGE SECURITIES
CORP.; CWABS, INC.; CWALT, INC.; FBR
SECURITIZATION, INC.; FIELDSTONE
MORTGAGE INVESTMENT
CORPORATION; FINANCIAL ASSET
SECURITIES CORP.; FREMONT
MORTGAGE SECURITIES
CORPORATION; GS MORTGAGE

ORAL ARGUMENT REQUESTED

Civil Action No. 1:10-CV-11376-NMG

**DEFENDANTS' JOINT MOTION
PURSUANT TO FED. R. CIV. P. 26(b)(1)
AND 6(b) FOR LEAVE TO TAKE
JURISDICTIONAL DISCOVERY AND
TO EXTEND BRIEFING ON
PLAINTIFF'S MOTION TO REMAND**

[CAPTION CONTINUED
ON NEXT PAGE]

SECURITIES CORP.; HSI ASSET
SECURITIZATION CORPORATION; J.P.
MORGAN ACCEPTANCE CORPORATION
I; LONG BEACH SECURITIES CORP.;
MERRILL LYNCH MORTGAGE
INVESTORS, INC.; MORGAN STANLEY
ABS CAPITAL I INC.; MORGAN
STANLEY CAPITAL I INC.; MORTGAGE
ASSET SECURITIZATION
TRANSACTIONS, INC.; NATIONSTAR
FUNDING LLC; NEW CENTURY
MORTGAGE SECURITIES LLC; NEW
CENTURY MORTGAGE SECURITIES,
INC.; NOVASTAR MORTGAGE FUNDING
CORPORATION; PARK PLACE
SECURITIES, INC.; PEOPLE'S CHOICE
HOME LOAN SECURITIES CORP.;
POPULAR ABS, INC.; RESIDENTIAL
ACCREDIT LOANS, INC.; RESIDENTIAL
ASSET MORTGAGE PRODUCTS, INC.;
RESIDENTIAL ASSET SECURITIES
CORPORATION; SACO I INC.; SAXON
ASSET SECURITIES COMPANY;
SECURITIZED ASSET BACKED
RECEIVABLES LLC; STANWICH ASSET
ACCEPTANCE COMPANY, L.L.C.;
STRUCTURED ASSET MORTGAGE
INVESTMENTS II INC.; and
WASHINGTON MUTUAL MORTGAGE
SECURITIES CORP.

Defendants.

Pursuant to Rules 26 and 6 of the Federal Rules of Civil Procedure and Rule 7.1 of the
Local Rules of the United States District Court for the District of Massachusetts, Defendants
Barclays Capital Inc., BCAP LLC, Securitized Asset Backed Receivables LLC, Credit Suisse
Securities (USA) LLC, Credit Suisse First Boston Mortgage Securities Corp., Asset Backed
Securities Corporation, Goldman, Sachs & Co., GS Mortgage Securities Corp., Morgan Stanley
& Co. Incorporated, Morgan Stanley ABS Capital I Inc., Morgan Stanley Capital I Inc., Saxon

Asset Securities Company, Citigroup Global Markets Inc., Citigroup Mortgage Loan Trust Inc., UBS Securities LLC, Mortgage Asset Securitization Transactions, Inc., Banc of America Securities LLC, Banc of America Mortgage Securities, Inc., Merrill Lynch, Pierce, Fenner & Smith, Inc., Merrill Lynch Mortgage Investors, Inc., Asset Backed Funding Corporation, RBS Securities, Inc., Financial Asset Securities Corp., Countrywide Securities Corporation, CWABS, Inc., CWALT, Inc., J.P. Morgan Securities, Inc., J.P. Morgan Acceptance Corporation I, Bear Stearns Asset Backed Securities I LLC, Long Beach Securities Corp., Washington Mutual Mortgage Securities Corp., SACO I Inc., Structured Asset Mortgage Investments II Inc., Residential Funding Securities, LLC, Residential Accredit Loans, Inc., Residential Asset Mortgage Products, Inc., Residential Asset Securities Corporation, HSBC Securities (USA), Inc., HSI Asset Securitization Corporation, FBR Securitization, Inc., FBR Capital Markets & Co., Ameriquest Mortgage Securities, Inc., Argent Securities, Inc., Park Place Securities, Inc., Novastar Mortgage Funding Corporation, Aegis Asset Backed Securities Corporation, Nationstar Funding LLC, Stanwich Asset Acceptance Company LLC, Deutsche Bank Securities, Inc. and Ace Securities Corp. hereby jointly move (1) for leave from the Court to take Plaintiff's Deposition by Oral Examination and to serve on Plaintiff a Request for the Production of Documents; and (2) for an extension of the briefing schedule with respect to Plaintiff's Motion to Remand. In further support of this motion, the Defendants submit contemporaneously herewith their Memorandum of Law in Support of Their Joint Motion for Leave to Take Jurisdictional Discovery and to Extend Briefing on Plaintiff's Motion to Remand. In addition, Defendants also submit contemporaneously herewith the Affidavit of Matthew L. Craner in Support of Defendants' Joint Motion for Leave to Take Jurisdictional Discovery and to Extend Briefing on Plaintiff's Motion to Remand.

WHEREFORE, the Defendants respectfully request that this Court enter an order (1) permitting Defendants to take Plaintiff's Deposition by Oral Examination and to serve on Plaintiff a Request for the Production of Documents; (2) extending Defendants' time to respond to Plaintiff's Motion to Remand until no later than 10 days after completion of Plaintiff's 30(b)(6) deposition; and (3) granting such further relief as this Court deems appropriate.

REQUEST FOR ORAL ARGUMENT

The Defendants believe that oral argument may assist this Court in deciding the issues raised in this motion and, as a result, pursuant to Local Rule 7.1(d), respectfully request a hearing on this motion.

Dated: October 18, 2010

Respectfully submitted,

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LOCAL RULE 7.1(a)(2) CERTIFICATE

I, Gary Greenberg, hereby certify that on October 18, 2010, I contacted Plaintiff's counsel by telephone and attempted in good faith to resolve the issues regarding Defendants' Joint Motion for Leave to Take Jurisdictional Discovery and to Extend Briefing on Plaintiff's Motion to Remand.

/s/ Gary R. Greenberg
Gary R. Greenberg

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent via U.S. first class mail to those indicated as non-registered participants on October 18, 2010.

/s/ Gary R. Greenberg
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